

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
CLERK OF COURT

2004 FEB 12 P 10:35

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MARK E. FEINERSTEIN, Individually and On)
Behalf of All Others Similarly Situated)

Plaintiff,)

-against-)

MARSH & MCLENNAN COMPANIES, INC,)
et al.,)

Defendants.)
-----)

MARIA DAGOSTINO-GANNON, Individually and)
On Behalf of All Others Similarly Situated,)

Plaintiff,)

-against-)

PUTNAM INVESTMENTS TRUST, et al.,)

Defendants.)
----- x

Civil Action

No. 03-12474-UA ✓ MLW - RCL

Civil Action

No. 03-12475-GAO

**DEFENDANTS' MOTION FOR LEAVE TO FILE REPLY MEMORANDUM
IN FURTHER SUPPORT OF DEFENDANTS' MOTION TO
STAY PROCEEDINGS PENDING RULING BY THE
JUDICIAL PANEL ON MULTIDISTRICT LITIGATION**

Putnam Investment Management, LLC, Putnam Investments Trust, Marsh & McLennan Companies, Inc., Putnam Investment Funds, and the various named Putnam mutual funds (collectively, the "Putnam Defendants") hereby move this Court for an Order, pursuant to Local Rule 7.1(B)(3), for leave to file a reply memorandum in further support of their motion to stay proceedings pending a ruling by the Judicial Panel on Multidistrict Litigation. As grounds for this motion, the Putnam Defendants state as follows:

1. On January 8, 2004, plaintiffs in the above-captioned actions filed a motion to consolidate and to appoint lead counsel with this Court.
2. On January 22, 2004, the Putnam Defendants filed an opposition to plaintiffs' motion and moved this Court to stay all proceedings in the actions.
3. On February 5, 2004, plaintiffs filed an opposition to the Putnam Defendants' motion to stay all proceedings.
4. The Putnam Defendants' reply, submitted herewith, concisely addresses plaintiffs' arguments. The Putnam Defendants submit that their reply will clarify matters for the Court and will be helpful in resolving the pending motions.

WHEREFORE, the Putnam Defendants respectfully request that this Court grant leave to file the accompanying reply memorandum.

Dated: February 12, 2004
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LOCAL RULE 7.1 CERTIFICATION

I, James R. Carroll, hereby certify that on February 12, 2004, counsel for Putnam Investments Trust conferred with counsel for the plaintiffs in the above-captioned actions pursuant to Local Rule 7.1(A)(2) who stated that they take no position with respect to the relief sought by this motion.

Dated: February 12, 2004

James R. Carroll (Dsc)
James R. Carroll

CERTIFICATE OF SERVICE

I, James R. Carroll, hereby certify that on February 12, 2004, I caused a true copy of the foregoing document to be served by first class mail, postage prepaid, upon counsel of record for each other party as indicated on the service list attached hereto.

Dated: February 12, 2004

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